

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 1997)

Docket No. R97-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS CARL G. DEGEN
(OCA/USPS-T12-65)
September 17, 1997

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories 1-7 to the United States Postal Service dated July 16, 1997, are hereby incorporated by reference.

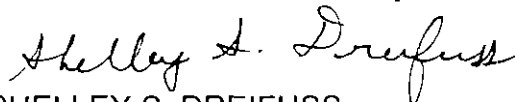
Respectfully submitted,



GAIL WILLETTE

Director

Office of the Consumer Advocate



SHELLEY S. DREIFUSS

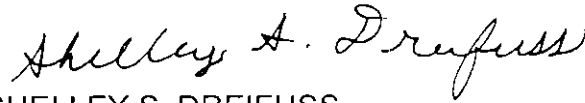
Attorney

OCA/USPS-T12-65. Please refer to interrogatory OCA/USPS-14, redirected from the Postal Service and answered by witness Alexandrovich. In witness Alexandrovich's response, he indicates that your testimony (and witness Brehm's) go into greater detail (than does his testimony) about the underlying volume variability changes and distribution keys for component C/S 2.2 and C/S 3.2 costs that contributed to the 12-to-1 and 15-to-1 ratios calculated in parts a. and b. of interrogatory 14.

- a. Please provide detailed explanations for parts a.i.-iv. of interrogatory 14.
- b. Please provide detailed explanations for parts b.i.-iv. of interrogatory 14 (but make the following correction in subpart iii.: change " $1123 \div 25$ " to " $1123 \div 74$ " to yield the 1518% ratio).
- c. In providing the explanations sought in parts a. and b. of the instant interrogatory, please address how the volume variability and distribution key changes in the instant case may have affected a subclass as small as Library Rate mail. Include in this discussion your views on how new MODS data specifically impact Library Rate mail. If possible, try to match operations to which Library Rate mail is subject to the new MODS cost pools and distribution keys. Please do the same for Special Fourth Class Rate mail.
- d. If witness Brehm is more knowledgeable about these issues than you are, please redirect these questions (or portions of these questions) to him.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

A handwritten signature in cursive script, reading "Shelley S. Dreifuss".

SHELLEY S. DREIFUSS
Attorney

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